

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

FEDERAL ELECTION COMMISSION,)	
)	
Plaintiff,)	
)	Civil Case No. 1:12-CV-00958
v.)	
)	
CRAIG FOR U.S. SENATE, et. al.,)	
)	
Defendants.)	
_____)	

**DEFENDANTS CRAIG FOR U.S. SENATE’S, KAYE O’RIORDAN’S
AND LARRY E. CRAIG’S ANSWER**

Defendants through their undersigned counsel, responds as follows to the original complaint in this litigation. Everything not given a specific response is DENIED.

1. No response is required to this paragraph, which contains plaintiff’s characterizations of the legal claims in the complaint.
2. ADMIT regarding the type of relief sought in this matter.
3. ADMIT that this Court has jurisdiction over this suit.
4. ADMIT that venue is proper.
5. ADMIT that the Federal Election Commission (“Commission”) is a federal agency created by the Federal Election Campaign Act (“Act”) and that it is authorized to initiate civil actions to obtain judicial enforcement of the Act.
6. ADMIT.
7. ADMIT.
8. ADMIT as to factual allegations. Defendants note that on April 8, 2013, Kaye L. O’Riordan resigned as Treasurer of Craig for U.S. Senate Committee and the Committee is in the process of notifying the Commission and naming a new Treasurer. The last sentence of this

paragraph contains conclusions of law and plaintiff's characterizations of the Act to which no response is required.

9. This paragraph contains conclusions of law and plaintiff's characterizations of the Act to which no response is required.

10. This paragraph contains conclusions of law and plaintiff's characterizations of the Act to which no response is required.

11. This paragraph contains conclusions of law and plaintiff's characterizations of the Act and related materials to which no response is required. However, plaintiff's factual and legal assertions relating to its determinations in its advisory opinions are DENIED.

12. ADMIT.

13. ADMIT.

14. ADMIT.

15. ADMIT.

16. ADMIT.

17. ADMIT.

18. ADMIT.

19. ADMIT.

20. ADMIT.

21. ADMIT.

22. ADMIT that the paragraph accurately quotes the content of the letter. To the extent that this paragraph is deemed an admission regarding Senator Craig's conduct, then this paragraph is DENIED.

23. ADMIT that the paragraph accurately quotes the content of the "Public Letter of

Admonition.” To the extent that this paragraph alleges that Senator Craig failed to comply with the rules of the United States Senate, it is DENIED.

24. ADMIT.

25. ADMIT.

26. ADMIT.

27. ADMIT.

28. ADMIT.

29. ADMIT.

30. ADMIT.

31. ADMIT.

32. This paragraph requires no response.

33. Defendants ADMIT the first sentences of this paragraph. The remainder of this paragraph contains conclusions of law and plaintiff’s characterizations of the Act to which no response is required. However, if any answer may be deemed necessary, defendants DENY that disbursements were not ordinary and necessary expenses incurred in connection with official duties or that they would have existed irrespective of Senator Craig’s duties as a Senator.

34. This paragraph contains conclusions of law and plaintiff’s characterizations of the Act to which no response is required. However, if any answer may be deemed necessary, defendants DENY that they have violated 2 U.S.C. § 439a(b).

PRAYER FOR RELIEF. Defendants are not required to respond to plaintiff’s prayer for relief. But, if a response is deemed necessary, defendants DENY that any relief should be granted.

Dated: April 11, 2013

Respectfully Submitted,

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